

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

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| IN RE AUTOMOTIVE PARTS ANTITRUST LITIGATION | 12-md-2311 |
| ALL PARTS | Honorable Marianne O. Battani |
| THIS DOCUMENT RELATES TO: ALL CASES | |

**END-PAYOR PLAINTIFFS' MOTION FOR SUBSTITUTION OF END-PAYOR
PLAINTIFFS CO-LEAD CLASS COUNSEL**

End-Payor Plaintiffs hereby move for amendment of: (1) the Court's Order Granting End-Payor Plaintiffs' Application for Appointment of Interim Co-Lead Class Counsel and Liaison Counsel (Dkt. No. 65); and (2) Case Management Order No 3 (Dkt. No. 271) by having the firm of Robins, Kaplan, Miller & Ciresi L.L.P substituted for Labaton Sucharow LLP as Co-Lead Class Counsel for End-Payor Plaintiffs in all cases related to, filed in or transferred to this Court in MDL No. 2311, including but not limited to the following cases pending before the Court: (a) Wire Harness Systems; (b) Instrument Panel Clusters; (c) Fuel Senders; (d) Heater Control Panels; (e) Bearings; and (f) Occupant Safety Systems.

This motion is based on the accompanying memorandum of law and such other and further material as the Court may consider. The motion is supported by Labaton Sucharow LLP, Interim Co-Lead Class Counsel for End-Payor Plaintiffs, and Interim Liaison Class Counsel for End-Payor Plaintiffs.

Dated: February 8, 2013

Respectfully submitted,

/s/ E. Powell Miller

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*INTERIM LIAISON COUNSEL FOR
END-PAYOR PLAINTIFFS*

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**END-PAYOR PLAINTIFFS' MEMORANDUM IN SUPPORT OF MOTION FOR
SUBSTITUTION OF END-PAYOR PLAINTIFFS INTERIM
CO-LEAD CLASS COUNSEL**

End-Payor Plaintiffs submit this memorandum in support of their motion to amend: (1) the Court’s Order Granting End-Payor Plaintiffs’ Application for Appointment of Interim Co-Lead Class Counsel and Liaison Counsel (Dkt. No. 65); and (2) Case Management Order No 3 (Dkt. No. 271) (together, “Orders”) by having the firm of Robins, Kaplan, Miller & Ciresi L.L.P. (“Robins Kaplan”) substituted for Labaton Sucharow LLP (“Labaton Sucharow”) as Interim Co-Lead Class Counsel for End-Payor Plaintiffs in all cases related to, filed in or transferred to this Court in MDL No. 2311, including but not limited to the following cases pending before the Court: (a) Wire Harness Systems; (b) Instrument Panel Clusters; (c) Fuel Senders; (d) Heater Control Panels; (e) Bearings; and (f) Occupant Safety Systems.

Since the inception of this case, Labaton Sucharow had the following attorneys principally work on this litigation: Hollis Salzman, Bernard Persky and William V. Reiss. Each of these attorneys has left Labaton Sucharow and is now associated with Robins Kaplan. Notably, Labaton Sucharow, Interim Co-Lead Class Counsel for End-Payor Plaintiffs, and Interim Liaison Counsel for End-Payor Plaintiffs support this motion.

Robins Kaplan has the full financial capability of serving as Interim Co-Lead Class

Counsel in this litigation, as well as the requisite expertise and institutional knowledge given that all of the attorneys who principally prosecuted this litigation at Labaton Sucharow are now at Robins Kaplan.¹

Accordingly, for the reasons set forth above, End-Payor Plaintiffs respectfully submit that the Orders should be amended to substitute Robins Kaplan for Labaton Sucharow as Interim Co-Lead Class Counsel for End-Payor Plaintiffs.

Dated: February 8, 2013

Respectfully submitted,

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*INTERIM LIAISON COUNSEL FOR
END-PAYOR PLAINTIFFS*

¹ For additional information about Robins Kaplan and its Antitrust and Trade Regulation practice, see <http://www.rkmc.com/>.

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12-md-2311

Honorable Marianne O. Battani

CERTIFICATE OF SERVICE

I hereby certify that on February 8, 2013 I electronically filed the attached document with the Clerk of the Court using the ECF system which will send notification of such filing to all filing users indicated on the Electronic Notice List through the Court's electronic filing system.

I also certify that I will serve copies via First Class U.S. Mail upon all other parties indicated on the Manual Notice List.

THE MILLER LAW FIRM, P.C.

/s/ E. Powell Miller

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